

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

United States of America)
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v.) Cr. No.: 23-CR-00072-JL-TSM-01
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DEFENDANT'S SENTENCING MEMORANDUM

Defendant NuDay respectfully requests that the Court impose the parties' agreed-upon sentence, as set forth in its Plea Agreement, of five years of probation and a \$25,000.00 fine.

NuDay, a 501(c)(3) non-profit, was founded in 2013 by Nadia Alawa. Presentence Investigation Report ("PSR") ¶ 7. NuDay was formed to support woman and children in Syria who had been impacted by the Syrian civil war. PSR ¶ 9. NuDay grew to support those in need in other regions of the world as well. *Id.*

Under Ms. Alawa's leadership, NuDay provided millions of dollars in goods and other support to thousands of people in need. PSR ¶ 46. NuDay was strong with its mission. It was not as strong, however, in retaining qualified professionals to address the complicated regulatory scheme of shipping goods overseas, particularly to a sanctioned country such as Syria.

In response to the Government's investigation, NuDay implemented safeguards to help ensure no future violations, including retaining a third-party export compliance consultant, developing and approving new export compliance programs, and overhauling its shipping procedures. PSR ¶¶ 48- 49. NuDay is appreciative of the cooperation it has had with the various government agencies and is positioned well to comply with federal regulations in the future.

NuDay joins the government in its sentencing request of five years of probation and a \$25,000.00 fine. NuDay has deposited the stipulated fine and special assessment with the Clerk of Court.

Respectfully submitted,

NuDay a/k/a NuDay Syria
By Its Attorneys:
SHAHEEN & GORDON, P.A.

Dated: December 14, 2023

/s/ Brian M. Quirk
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